

## UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia



Norfolk \_\_\_\_\_ Division

ALIMU SILLAH

Case No.

(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

BLUEFORCE INC

Jury Trial: (check one)  Yes  No

## Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	ALIMU SILLAH
Street Address	826 PARK CENTRAL COURT APT. C
City and County	INDIANAPOLIS MARION
State and Zip Code	46260
Telephone Number	929-990-1520
E-mail Address	airbereti@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	<u>MOORE MELOTTI</u>
Job or Title ( <i>if known</i> )	<u>ACADEMIC DIRECTOR</u>
Street Address	<u>6 MANHATTAN SQUARE</u>
City and County	<u>HAMPTON ELIZABETH CITY</u>
State and Zip Code	<u>VIRGINIA-23666</u>
Telephone Number	<u>757-788-8441</u>
E-mail Address ( <i>if known</i> )	

**Defendant No. 2**

Name	<u>LES LUNCEFORD</u>
Job or Title ( <i>if known</i> )	<u>PROJECT MANAGER</u>
Street Address	<u>6 MANHATTAN SQUARE</u>
City and County	<u>HAMPTON ELIZABETH CITY</u>
State and Zip Code	<u>VIRGINIA-23666</u>
Telephone Number	<u>757-788-8441</u>
E-mail Address ( <i>if known</i> )	

**Defendant No. 3**

Name	<u>ROBERT YOUNG</u>
Job or Title ( <i>if known</i> )	<u>PROJECT MANAGER</u>
Street Address	<u>6 MANHATTAN SQUARE</u>
City and County	<u>HAMPTON ELIZABETH CITY</u>
State and Zip Code	<u>VIRGINIA-23666</u>
Telephone Number	<u>757-788-8441</u>
E-mail Address ( <i>if known</i> )	

**Defendant No. 4**

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- Federal question       Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

My employer failed to apply equal opportunity in protecting my employment as a US Citizen on a foreign soil. Instead, was treating me as an enemy and not being sympathetic to my condition when I felt sick to relief me to see my doctor. My human rights were violated. My employer didn't show any sympathy feeling towards me being ill at all whatsoever. Just kept harassing me and making false claims with no justification. This is not what America constitution stand for.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* ALIMU SILLAH, is a citizen of the  
State of *(name)* INDIANA.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* BLUEFORCE INC, is incorporated  
under the laws of the State of *(name)* VIRGINIA,  
and has its principal place of business in the State of *(name)*  
VIRGINIA.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* MOORE MELOTTI, is a citizen of  
the State of *(name)* VIRGINIA. Or is a citizen of  
*(foreign nation)*.

b. If the defendant is a corporation

The defendant, (name) LES LUNCEFORD, is incorporated under the laws of the State of (name) VIRGINIA, and has its principal place of business in the State of (name) VIRGINIA.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) VIRGINIA.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

On April 9, BF terminated my contract while on sick leave. Falsey accusing me of allowing my students to sleep in class and playing music. Falsey accusing me of sleeping in class with no evidence. Continue to harrass me after complaining to OFCCP of Blueforce planning to terminate my contract. . As a result of all what my employer did to me, my sugar level increases, and blood pressure as well. Cause me to be unemployed.

---

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On April 9, terminated my contract while on sick leave. Falsey accusing me of allowing my students to sleep in class and playing music. Falsey accusing me of sleeping in class with no evidence. Continue to harass me after complaining to OFCCP of Blue force planning to terminate my contract. When I applied for employment in similar field, Blue force gave bad recommendation to new employer. I was denied employment more than two times. As as result, of what my entire as result of employer did to me, my sugar level increases and blood pressure as well.

---

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The wrongful termination of my job reduced my income tremendously. I was earning with my employer \$62,000 per year. I have been unemployed for about a year. If I was still employed with the 5 years contract with my former employer, I would have earned a lot more. Lost wages with punitive damages, pain and suffering causing mental and physical health deteriorating each day is unbearable. I would like the court to order my former employer Blueforce the amount of \$500,000 to relief of my condition they force me to be in.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

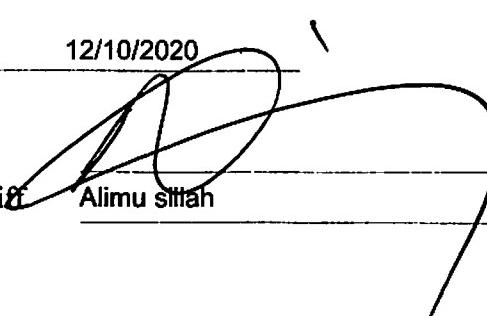
**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 12/10/2020

Signature of Plaintiff

Printed Name of Plaintiff

Alimu Sittah

**B. For Attorneys**

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

*Alimu Sillah*

Certified Defense Language Instructor  
826 Park Central Court Apt. C  
Indianapolis, Indiana 46260

**Subject:** For filing: Civil complaint for wrongful termination of employment and retaliation.

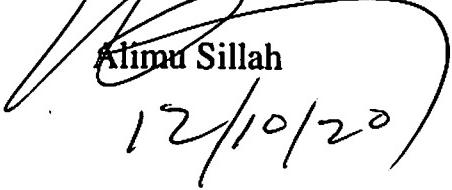
Dear Clerk,

Attached to this letter, please find my original complaint against my former employer Blueforce inc for wrongful termination of my employment and retaliating against me for participating in a prior United States Department of Labor OFCCP investigation of race discrimination by treating me less favorably than other similar employee engaged in protected activity.

I have enclosed the amount of \$402.00 in the form of a money order payable to the US district court.

At this time, I am not seeking service of process or the issuance of a summons. I will either seek Defendant's waiver of process pursuant to statute or request the issuance of a summons at a later date.

Sincerely,

  
Alimu Sillah

12/10/20

**COVER SHEET FOR FILING CIVIL ACTIONS**

COMMONWEALTH OF VIRGINIA

Case No. .....  
(CLERK'S OFFICE USE ONLY)

UNITED STATES DISTRICT COURT NORFOLK VIRGINIA Circuit Court

ALIMU SILLAH

PLAINTIFF(S)

v./In re:

BLUEFORCE INC.

DEFENDANT(S)

I, the undersigned [x] plaintiff [ ] defendant [ ] attorney for [ ] plaintiff [ ] defendant hereby notify the Clerk of Court that I am filing the following civil action. (Please indicate by checking box that most closely identifies the claim being asserted or relief sought.)

**GENERAL CIVIL****Subsequent Actions**

- [x] Claim Impleading Third Party Defendant
- [x] Monetary Damages
- [ ] No Monetary Damages
- [x] Counterclaim
- [x] Monetary Damages
- [ ] No Monetary Damages
- [ ] Cross Claim
- [ ] Interpleader
- [ ] Reinstatement (other than divorce or driving privileges)
- [ ] Removal of Case to Federal Court

**Business & Contract**

- [ ] Attachment
- [ ] Confessed Judgment
- [ ] Contract Action
- [ ] Contract Specific Performance
- [ ] Detinue
- [ ] Garnishment

**Property**

- [ ] Annexation
- [ ] Condemnation
- [ ] Ejectment
- [ ] Encumber/Sell Real Estate
- [ ] Enforce Vendor's Lien
- [ ] Escheatment
- [ ] Establish Boundaries
- [ ] Landlord/Tenant
- [ ] Unlawful Detainer
- [ ] Mechanics Lien
- [ ] Partition
- [ ] Quiet Title
- [ ] Termination of Mineral Rights

**Tort**

- [ ] Asbestos Litigation
- [ ] Compromise Settlement
- [ ] Intentional Tort
- [ ] Medical Malpractice
- [ ] Motor Vehicle Tort
- [ ] Product Liability
- [ ] Wrongful Death
- [ ] Other General Tort Liability

**ADMINISTRATIVE LAW**

- [x] Appeal/Judicial Review of Decision of (select one)
  - [ ] ABC Board
  - [ ] Board of Zoning
  - [ ] Compensation Board
  - [ ] DMV License Suspension
  - [ ] Employee Grievance Decision
  - [x] Employment Commission
  - [ ] Local Government
  - [ ] Marine Resources Commission
  - [ ] School Board
  - [ ] Voter Registration
  - [ ] Other Administrative Appeal

**DOMESTIC/FAMILY**

- [ ] Adoption
  - [ ] Adoption – Foreign
- [ ] Adult Protection
- [ ] Annulment
  - [ ] Annulment – Counterclaim/Responsive Pleading
- [ ] Child Abuse and Neglect – Unfounded Complaint
- [ ] Civil Contempt
- [ ] Divorce (select one)
  - [ ] Complaint – Contested\*
  - [ ] Complaint – Uncontested\*
  - [ ] Counterclaim/Responsive Pleading
  - [ ] Reinstatement – Custody/Visitation/Support/Equitable Distribution
- [ ] Separate Maintenance
  - [ ] Separate Maintenance Counterclaim

**WRITS**

- [ ] Certiorari
- [ ] Habeas Corpus
- [ ] Mandamus
- [ ] Prohibition
- [ ] Quo Warranto

**PROBATE/WILLS AND TRUSTS**

- [ ] Accounting
- [ ] Aid and Guidance
- [ ] Appointment (select one)
  - [ ] Guardian/Conservator
  - [ ] Standby Guardian/Conservator
  - [ ] Custodian/Successor Custodian (UTMA)
- [ ] Trust (select one)
  - [ ] Impress/Declare/Create
  - [ ] Reformation
- [ ] Will (select one)
  - [ ] Construe
  - [ ] Contested

**MISCELLANEOUS**

- [ ] Amend Death Certificate
- [ ] Appointment (select one)
  - [ ] Church Trustee
  - [ ] Conservator of Peace
  - [ ] Marriage Celebrant
- [ ] Approval of Transfer of Structured Settlement
- [ ] Bond Forfeiture Appeal
- [ ] Declaratory Judgment
- [ ] Declare Death
- [ ] Driving Privileges (select one)
  - [ ] Reinstatement pursuant to § 46.2-427
  - [ ] Restoration – Habitual Offender or 3<sup>rd</sup> Offense
- [ ] Expungement
- [ ] Firearms Rights – Restoration
- [ ] Forfeiture of Property or Money
- [ ] Freedom of Information
- [ ] Injunction
- [ ] Interdiction
- [ ] Interrogatory
- [ ] Judgment Lien-Bill to Enforce
- [ ] Law Enforcement/Public Official Petition
- [ ] Name Change
- [ ] Referendum Elections
- [ ] Sever Order
- [ ] Taxes (select one)
  - [ ] Correct Erroneous State/Local
  - [ ] Delinquent
- [ ] Vehicle Confiscation
- [ ] Voting Rights – Restoration
- [x] Other (please specify) .....  
retaliation and wrongful terminate job

[x] Damages in the amount of \$ 500.00 are claimed.

12/10/2020

DATE

ALIMU SILLAH

PRINT NAME

[x] PLAINTIFF

[ ] DEFENDANT

[ ] ATTORNEY FOR

[ ] PLAINTIFF

[ ] DEFENDANT

826 PARK CENTRAL COURT APT. C  
ADDRESS/TELEPHONE NUMBER OF SIGNATOR  
INDIANAPOLIS, INDIANA 46260

airbereti@gmail.com

EMAIL ADDRESS OF SIGNATOR (OPTIONAL)

\*\*Contested\*\* divorce means any of the following matters are in dispute: grounds of divorce, spousal support and maintenance, child custody and/or visitation, child support, property distribution or debt allocation. An "Uncontested" divorce is filed on no fault grounds and none of the above issues are in dispute.